



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
1625 HOLLYWOOD DRIVE
JACKSON, TENNESSEE 38305-4316
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (731) 661-6283**

July 1, 2016

**Scott Ball, MS4 Program Manager
City of Dyersburg
435 Highway 51 By-Pass South
P.O. Box 1358
Dyersburg, Tennessee 38025-1358**

**REF: City of Dyersburg
Phase II Municipal Separate Storm Sewer System (MS4)
Compliance Evaluation Inspection
Permit No.: TNS075264
Dyer County**

Dear Mr. Ball,

On Thursday, June 23, 2016, I met with you and your City Engineer, Ms. Tiffancy Heard for the purpose of evaluating the City Of Dyersburg's (City) progress towards compliance with the the MS4 permit noted in the reference section of this letter.

It was very gratifying to be able to document that noteable progress has been made since I conducted an Audit of your Phase II MS4 program the fourth week of February, 2015. During the audit of 2015, it became obvious to this inspector that the City of Dyersburg has an active and very effective MS4 program based on an excellent City "Stormwater Ordinance". In fact, the City of Dyersburg's Stormwater Ordinance is ahead of the curve being that the ordinance already requires a half inch capture of a rainfall event on new development. To Dyersburg's credit, the capture concept was only only introduced to the Phase II MS4's in the 2010 permit with the implementation of the "first one" inch capture becoming a requirement during the five year period of the anticipated 2016 Phase II MS4 permit.

As previously noted, the Audit was the fourth week of February, 2015. To you, and Tiffany Heard's credit, the City of Dyersburg submitted to the Jackson Environmental Field Office a copy of their draft "Stormwater Management Plan" (SWMP) on July 30, 2015 and their Public Information and Education (PIE) Plan was completed by August, 2015. I have reviewed both and found them to be sound documents.

Additional comments are as follows:

- 1. Per Dyersburg's SWMP, the City has committed to complete your "Enforcement Response Plan" (ERP) by September 1, 2017. The City has also committed to complete the permit required "Illicit Discharge Detection and Elimination Plan" (IDDE) by September 1, 2016.**
- 2. We discussed the required MS4 sampling and its status for the City. For the City of Dyersburg, there are two impaired (now referred to as unavailable) water bodies that require sampling. One is the North Forked River @ Highway 211 (S. Main Street) which requires ecoli sampling and the second location is Lewis Creek, downstream of Highway 104. Since Lewis Creek is also impaired/ unavailable for sedimentation, in addition to ecoli, a Semi-Quantitative Single Habitat (SQSH) evaluation must be done.**

To date, only the ecoli tests have been conducted. On behalf of Dyersburg, however, you did commit to having the SQSH completed before the sample window in 2016 expires. The sampling window began on June 1st of this year and will end on Friday, September 30th. This sampling window is defined in Section 5.2 of the 2010 permit.

- 3. The development of your the GIS Mapping System for stormwater had been delayed until a reasonable definition of an outfall was determined. To allow progress, it was mutually agreed to use the guidelines of an outfall being a 36" or larger pipe for non-industrial stormwater and 12" or larger pipe for industrial stormwater. Obviously these sizes can be changed as needed as you works through the evaluation process.**
- 4. The remaining portion of the inspection focused on a commercial site adjacent to Lewis Creek, several residential construction locations in Dyersburg, and a drive by review of several retention basins (now considered permanent BMP's) that had been maintained by the City for 15 years. The City discovered back in February of this year that 10 of these properties did not belong to the City. The decision was made to transfer that responsibility back to the property owners. Seven of the owners are doing adequate jobs maintaining their permanent stormwater control structures but three have made no effort to even cut the grass per the City's ordinance requirements.**

Since permanent stormwater BMP's and the proper maintenance of stormwater BMP's is one of the pillars of the Phase II MS4 General Permit, the City of Dyersburg's decision as to how they will proceed to properly maintain these three structures. The City's decision is important and could even affect MS4 compliance status.

Action Items:

- 1. Please complete the SQSH sampling on or before Friday, September 30, 2016. Please advise this office once it has been completed. Also, when the results are available, please provide me with a copy. It is my desire to have Amy Fritz and Brad Smith of this office evaluate the results in the context of data obtained by the Division of Water Resources.**

It is my hope that in-stream improvement will be noted giving value to the effectiveness of Dyersburg's MS4 program.

2. Please be reminded to document all training, educational and public participation efforts, any enforcement, inspections, complaint investigations, etc.
3. Continue to develop your Enforcement Response Plan to meet your September 1, 2017, commitment for completion.
4. Continue to develop your Illicit Discharge Detection and Elimination Plan to meet your September 1, 2016, commitment.
5. Please consider the benefit of the development of a Stormwater Pollution Prevention Plan (SWPPP) for the City's Public Works Facility.
6. Please advise this office as to the decision made by the City's governing body concerning how the maintenance of the 10 privately owned BMP's will be maintained in the future.

The courtesy and cooperation shown to me during this inspection was greatly appreciated. If you have any questions concerning this letter and enclosed detailed report, or if there is any other issue that you think I might be able to assist you with, feel free to call me at 731.512.1362 or by Email at James.W.Scott@tn.gov.

Sincerely,



James W. Scott

Jackson Environmental Field Office
1625 Hollywood Drive
Jackson, Tennessee 38305

CC John Holden, Mayor
City of Dyersburg
P. O. Box 1358
Dyersburg, Tennessee 38025-1358

Tiffany Heard, P.E., City Engineer
City of Dyersburg
435 Highway 51 By-Pass South
P.O. Box 1358
Dyersburg, Tennessee 38025-1358



TDEC - Division of Water Resources
Jackson Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TNS075264	Facility Site Name	City of Dyersburg		
		Address	435 Highway 51 Bypass South, Dyersburg, Tennessee 38024		
Permit Eff. Date:	May 13, 2011	Permit Exp Date:	Sep 1, 2015	SIC Code:	

Compliance Monitoring Information

Compliance Monitoring Activity Name	Compliance Evaluation (non-sampling) (CEI)				
	* If Bio Monitoring is selected above, select the method used:				
Compliance Monitoring Activity	Evaluation				

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	06/23/2016 8:30	Exit Date/Time (mm/dd/yyyy hh:mm):	06/23/2016 03:20	
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Facility Representatives

Scott Ball, MS4 Program Manager, 731-288-7696	John Holden, Mayor, 731-287-7600
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act	
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)			
Compliance Monitoring Reason:	Agency Priority			
Compliance Monitoring Agency Type:	State	Agency Name:	TDEC - DWR	
Did EPA assist/ Inspection?	No	Time Physically conducting activity:	Days: 3	Hours:
Inspection Type:	State	Compliance Monitoring Action Outcome:	Under Review	
Lead Agency:	State	Compliance Monitoring Rating Code:	Satisfactory	
If Joint Inspection, what was the purpose of the other party?				

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input checked="" type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

Dyersburg has had a very aggressive program for years by just lacked the written program as required by their MS4 permit. They have made tremendous progress over the past year.

EPA and State Representatives

Inspector's Signature	TDEC-DWR/ JEFO/ 731-512-1362	Jun 24, 2016
Manager's Signature	TDEC-DWR/ JEFO/ 731-512-1302	6/24/16
	Agency / Office / Phone	Date

(Note: This form can only be printed to an XPS document, then saved for later use.)